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10 Attorneys for Defendant  
Hartford Life and Accident Insurance Company

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

15 ALEXANDER PAMINTUAN,  
16 Plaintiff,  
17 v.  
18 HARTFORD LIFE AND ACCIDENT  
19 INSURANCE COMPANY, as Claims  
Administrator of the Life Care Centers of  
20 America, Inc. Welfare Benefits Plan; DOES I  
through V; and ROE CORPORATIONS I  
21 thru V inclusive,  
Defendants.

Case No. 2:21-cv-01365-RFB-NJK

**STIPULATION, REQUEST AND ORDER  
EXTENDING TIME TO FILE  
DISCOVERY PLAN/SCHEDULING  
ORDER**

[First Request]

24 The parties, Plaintiff Alexander Pamintuan (“Plaintiff”), through his counsel, Julie A.  
25 Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident  
26 Insurance Company (“Hartford”), through its counsel, Michael B. Bernacchi of Burke, Williams  
27 & Sorensen, LLP, hereby respectfully submit this Stipulation, Request and Order to Extend Time  
28 to file the Discovery Plan/Scheduling Order (the “Stipulation”). This Stipulation is made in

1 accordance with Local Rules IA 6-1, IA 6-2, and II 7-1. This is the first request for an extension  
 2 of time to file the Discovery Plan/Scheduling Order.

3       1. On September 29, 2021, Defendant Hartford filed its answer to Plaintiff's  
 4 Complaint. [Dkt. 11] Upon the filing of Hartford's answer, the Court issued a deadline for the  
 5 parties to file the Discovery Plan/Scheduling Order by November 13, 2021.

6       2. The parties conducted their Rule 26 conference on October 4, 2021.

7       3. The parties are actively engaged in settlement negotiations which they hope may  
 8 resolve this case and wish to extend the deadline to file the Discovery Plan/Scheduling Order by  
 9 30 days.

10      4. This request is made in good faith and not for purposes of delay.

11      5. The parties hereby jointly request that this Court extend the time to file the  
 12 Discovery Plan/Scheduling Order from November 13, 2021 to **December 13, 2021** while they  
 13 attempt to informally resolve this case without judicial intervention.

14           DATED this 28th day of October, 2021.

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Attorney for Plaintiff  
 Alexander Pamintuan

22           Attorneys for Defendant  
 23 Hartford Life And Accident Insurance Company

24  
**ORDER**

25  
**IT IS SO ORDERED.**

26 DATED: October 28, 2021

27 BY:   
 28 UNITED STATES MAGISTRATE JUDGE